

kb

**FILED**

AUG - 7 2018 <sup>kb</sup>

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

QUAN SHUN CHEN

)  
) No. **18CR 478**  
)

) Violations: Title 26, United States  
) Code, Sections 7206(1) and 7206(2)  
)

**JUDGE CHANG  
MAGISTRATE JUDGE COLE**

**COUNT ONE**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about May 6, 2013, in the Northern District of Illinois, Eastern Division,

QUAN SHUN CHEN,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Corporate Income Tax Return for Hunan Spring, Inc. (Form 1120 with schedules and attachments), for the fiscal year beginning March 1, 2012 and ending February 28, 2013, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$433,973, when defendant knew that gross receipts substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT TWO**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about May 8, 2014, in the Northern District of Illinois, Eastern Division,

QUAN SHUN CHEN,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Corporate Income Tax Return for Hunan Spring, Inc. (Form 1120 with schedules and attachments), for the fiscal year beginning March 1, 2013 and ending February 28, 2014, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$515,592, when defendant knew that gross receipts substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT THREE**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about June 1, 2015, in the Northern District of Illinois, Eastern Division,

QUAN SHUN CHEN,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Corporate Income Tax Return for Hunan Spring, Inc. (Form 1120 with schedules and attachments), for the fiscal year beginning March 1, 2014 and ending February 28, 2015, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$635,044, when defendant knew that gross receipts substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT FOUR**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about July 26, 2016, in the Northern District of Illinois, Eastern Division,

QUAN SHUN CHEN,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Corporate Income Tax Return for Hunan Spring, Inc. (Form 1120 with schedules and attachments), for the fiscal year beginning March 1, 2015 and ending February 28, 2016, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$157,740, when defendant knew that gross receipts substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).



**COUNT FIVE**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about October 10, 2016, in the Northern District of Illinois, Eastern Division,

QUAN SHUN CHEN,

defendant herein, willfully made and subscribed, and caused to be made and subscribed, a U.S. Corporate Income Tax Return for Hunan Spring Restaurant, Inc. (Form 1120 with schedules and attachments), for the calendar year 2015, which return was verified by a written declaration that it was made under penalties of perjury and was filed with the Internal Revenue Service, which return he did not believe to be true and correct as to every material matter, in that said return reported on Line 1a that gross receipts were \$422,624, when defendant knew that gross receipts substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(1).

**COUNT SIX**

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about November 6, 2017, in the Northern District of Illinois, Eastern Division,

QUAN SHUN CHEN,

defendant herein, willfully aided and assisted in, and procured, counseled and advised the preparation and presentation, under and in connection with any matter arising under the internal revenue laws, of a U.S. Corporate Income Tax Return for Hunan Spring Restaurant, Inc. (Form 1120 with schedules and attachments), for the calendar year 2016, which return was fraudulent and false as to a material matter, in that said return reported on Line 1a that gross receipts were \$995,498, when defendant knew that gross receipts substantially exceeded that amount;

In violation of Title 26, United States Code, Section 7206(2).

A TRUE BILL:

---

FOREPERSON

---

UNITED STATES ATTORNEY